

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiffs

v.

COMMONWEALTH OF PUERTO RICO, et
al.

Defendants

CIVIL NO.: 12-2039 (GAG)

**MOTION FOR LEAVE TO FILE PRPD'S SECOND PROGRESS REPORT IN
COMPLIANCE WITH REQUIREMENT 261 OF THE AGREEMENT**

TO THE HONORABLE COURT:

COMES NOW, the Puerto Rico Police Department ("PRPD") through the undersigned counsel and respectfully states as follows:

1. In accordance with Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department, PRPD submitted a sealed version of its second status report on May 18, 2015 to the Court, the Technical Compliance Advisor and counsel for the Department of Justice.
2. PRPD respectfully requests leave to file its Second Status Report with minor redactions to maintain the confidentiality of technological information.

WHEREFORE PRPD respectfully requests that this Court grants leave to file PRPD's Second Status Report.

WE HEREBY CERTIFY that on today's date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the parties and counsel of record.

In San Juan, Puerto Rico, this 26th day of August, 2015.

RESPECTFULLY SUBMITTED.

CESAR MIRANDA RODRÍGUEZ
Secretary of Justice

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